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7 *Attorneys for Defendant*
8 *Las Vegas Metropolitan Police Department*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 DAICHENA THOMAS, individually and as the
personal representative of Estate of Palmer
Pearce Joseph Wright; DANA THOMAS,
12 individually; DEVONTAY THOMAS,
individually; DELON ARMSTRONG,
13 individually; J. W., individually; GERMAINE
CARMENA, individually,

14 Plaintiffs,

15 vs.

16 CLARK COUNTY; LAS VEGAS
METROPOLITAN POLICE DEPARTMENT;
17 CLARK COUNTY DETENTION CENTER;
WELLPATH, LLC; CORRECT CARE
18 SOLUTIONS, LLC; J. MARCOS, RN; EARL
D. SALVIEJO, NP; TANJA WASIELEWSKI,
19 RN; H. TADDEO, RN; ACE T., RN; LARS
WILLIAMS, RN; H. HANNASH, RN; DAVID
20 OLIPHANT, PA; LPN ALEXIA; BECKY S.
CHRISTENSEN, RN; RAY MARTIN
21 MONTENEGRO, NP; KATE PURCELL, RN;
DOES I through C, inclusive, and ROE
22 CORPORATIONS I through II, inclusive,

23 Defendants.
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CASE NO.: 2:22-cv-0899-GMN-NJK

**STIPULATION TO EXTEND TIME TO
FILE REPLIES IN SUPPORT OF
MOTIONS FOR SUMMARY
JUDGMENT
(First Request)
[ECF Nos. 79, 80]**

1 The above-referenced parties, by and through their counsel of record, hereby agree and
 2 stipulate to extend the current deadline of August 16, 2024 for Defendants, Las Vegas
 3 Metropolitan Police Department (“LVMPD”); Wellpath, LLC; Correct Care Solutions, LLC; J.
 4 Marcos, RN; Earl D. Salviejo, NP; Tanja Wasielewski, RN; H. Taddeo, RN; Ace T. RN; Lars
 5 Williams, RN; H. Hannash, RN; David Oliphant, PA, LPN Alexia; Becky S. Christensen, RN;
 6 Ray Martin Montenegro, NP, and Kate Purcell, RN’s (“Wellpath Defendants”) to file their
 7 respective Replies in Support of their Motions for Summary Judgment, [Docket Nos. 79 and 80],
 8 for an additional seven (7) days, until August 23, 2024. This is the first requested extension
 9 between the parties. The extension is being requested as the Defendants’ Counsel requires
 10 additional time to prepare the replies due to other contemporaneous deadlines and an absence
 11 from the office.

12 The requested extension will not prejudice any party and will allow the Defendants to
 13 adequately brief their replies in support of their Motions for Summary Judgment filed with this
 14 Court. The parties are not delaying the conclusion of this matter by way of trial or otherwise; no
 15 trial date has yet been ordered.

16 DATED this 16th day of August, 2024.

DATED this 15th day of August, 2024.

17 STOVALL & ASSOCIATES

KAEMPFER CROWELL

18 /s/ Ross H. Moynihan

/s/ Lyssa Anderson

19 Leslie Mark Stovall, Esq.

Lyssa S. Anderson

20 Nevada Bar No. 2566

Nevada Bar No. 5781

Ross H. Moynihan, Esq.

Ryan W. Daniels

21 Nevada Bar No. 11848

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Las Vegas, NV 89107

Las Vegas, Nevada 89135

22 *Attorneys for Plaintiffs*

Attorneys for Defendant

Las Vegas Metropolitan Police Department

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1 DATED this 15th day of August, 2024.

2 LEWIS BRISBOIS BISGAARD & SMITH LLP

3 /s/ Ethan M. Featherstone

4 S. Brent Vogel, Esq.

5 Nevada Bar No. 6858

Ethan M. Featherstone, Esq.

6 Nevada Bar No. 11566

6385 S. Rainbow Blvd., Ste. 600

Las Vegas, NV 89118

Attorneys for Defendants

7 ***WellPath, LLC; Correct Care Solutions, LLC;***

8 ***J. Marcos, RN; Earl D. Salviejo, NP; Tanya***

Wasielewski, RN; H. Taddeo, RN; Ace T. RN;

9 ***Lars Williams, RN; H. Hannash, RN; David***

Oliphant, PA; LPN Alexia; Becky S.

10 ***Christensen, RN; Ray Martin Montenegro,***

NP; and Kate Purcell, RN

11 **ORDER**

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13 IT IS SO ORDERED.

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15 
16 UNITED STATES DISTRICT COURT JUDGE

17 Dated: August 16, 2024.
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